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May 5, 2020

VIA EMAIL  
Honorable Freda L. Wolfson  
Chief United States District Judge  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: United States v. Isaac Barlow, Criminal No. 06-00694-1 (FLW)

Dear Chief Judge Wolfson:

The Government has recently filed its Response to Defendant Barlow's Motion for Reduction in Sentence. Defendant Barlow is preparing a Reply Brief, but due to the Covid-19 crisis and the crush of Covid-19 matters pressing this office, we are requesting thirty days from this date within which the undersigned may file a Reply brief. This is necessary because we have only recently been able to release the Government's paper copies of its Response and Appendix from quarantine in the office mail and because the Government's papers are otherwise voluminous and detailed. With issues of this magnitude, our objective is to prepare a properly researched and well-reasoned Reply.

Our ability to prepare a Reply has been delayed, however, by a range of Covid-19-related matters that are also of great immediacy. I am in the process of filing motions and administrative applications on behalf of several clients, including one whose very life may be affected by the Covid-19 conditions at a BOP facility, and others whose conditions of confinement or release are seriously affected by Covid-19. These Covid-19 related problems may require our immediate attention in the near future, while at the same time as it is also important that we have the opportunity to prepare a proper Reply Brief in the instant matter.

I believe that a Reply Brief can be researched and written within 30 days and

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therefore I respectfully request that Defendant Barlow be permitted to file a reply brief on or before June 4, 2020.

Today I received the consent to this request of Asst. U.S. Atty Patrick Askin.

Thank you for your consideration.

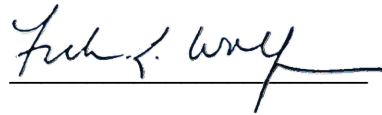
Respectfully submitted,

/s/ Robert J. Haney

Attorney for Isaac Barlow

cc: Isaac Barlow  
Asst. U.S. Atty. Patrick Askin

IT IS SO ORDERED: May 6, 2020

A handwritten signature in cursive script, appearing to read "Freda L. Wolfson", written over a horizontal line.